

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

VALANCIA GOODMAN and GREGORY MALOY,) Individually and as Administrators of the) ESTATE OF JAYLAN ANDRISE GOODMAN,) Plaintiffs))	CIVIL ACTION FILE NO.
v.) SHERIFF / CHIEF DEPUTY LEVON ALLEN) CHIEF DEPUTY / SHERIFF ROLAND BOEHRER) MAJOR RONNAE TOLBERT,) JAIL OFFICER DWIGHT GREEN) JAIL OFFICER CRAIG WRIGHT, et al) and CORRECT HEALTH CLAYTON, LLC) Defendants))	Jury Trial Demanded

FIRST REQUESTS FOR PRODUCTION TO ALL DEFENDANTS

PLEASE TAKE NOTICE that Plaintiffs request pursuant to Fed. R. Civ. P. 34 that Defendants produce all the following documents and things for inspection or copying for Plaintiffs within 45 days of receipt of these requests.

These requests are continuing in nature and require supplemental responses as provided by Rule 26 of the Federal Rules of Civil Procedure in the event any defendant, counsel, employee, investigator or agent of any defendant, or anyone representing the interests of Defendants, becomes aware of any additional document or thing sought by these requests between the time Defendants respond and trial. Please produce:

1. Inmate sheet for Jaylan Andrise Goodman.
2. Inmate sheet for Jarvis Cornelius Wallace.
3. All reports, emails, memos, disciplinary reports, incident reports, pass-down log, and other internal records, medical/mental health records, and other written communications regarding Jaylan Andrise Goodman.

4. All reports, emails, memos, disciplinary reports, incident reports, pass-down log, and other internal records, medical/mental health records, and other written communications regarding Jarvis Cornelius Wallace.
5. All reports, emails, memos, and other written communications regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed.
6. All photos and videos regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed.
7. Any and all microphone and radio recordings regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed.
8. A list of any and all officers in the location where Jaylan Andrise Goodman was killed.
9. The mobile or cellular phone number of the responding officers, and any communications sent or received, and documentation collected from or on, said mobile or cellular phone, and its whereabouts during and after the incident in question.
10. The complete investigatory file regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed.
11. Any and all witness statements regarding the July 14, 2022 incident in which Jaylan Andrise Goodman was killed.
12. An inventory of any and all items reviewed at the scene or thereafter.
13. The population chart identifying inmates in each cell in the housing unit where Jaylan Andrise Goodman was housed at Clayton County Jail. (The population chart should include each inmate's classification for the unit, whether the inmate was a mental health inmate, the crime or crimes for which each inmate was incarcerated).
14. A copy of the shift schedule for Clayton County Jail for July 9 through July 15, 2022;
15. A comprehensive list of the full name, rank, and badge number of each Clayton County Sheriff Office personnel identified in #14;
16. A list of each Clayton County Sheriff Office personnel who had any contact, interaction, and or any communication with Jaylan Andrise Goodman between July 9 and July 15, 2022;

17. A list of each Clayton County Sheriff Office personnel who had any contact, interaction, and or any communication with Jarvin Cornelius Wallace between July 9 and July 15, 2022;
18. The entire personnel file of each member of Clayton County Sheriff's Office who had contact, interaction, and or any communication with Jaylan Andrise Goodman between July 9 and July 15, 2022;
19. The entire personnel file of each member of Clayton County Sheriff's Office who had contact, interaction, and or any communication with Jarvin Cornelius Wallace between July 9 and July 15, 2022;
20. The full name, rank, and badge number of each Clayton County Sheriff Office personnel who had decision making authority with regard to inmate cell placement between July 9 and July 15, 2022;
21. The full name, rank, and badge number of each Clayton County Sheriff Office personnel (and or other type of identification if not personnel of Clayton County Sheriff Office) who evaluated inmates at Clayton County Jail for mental health between July 9 and July 15, 2022.
22. All communications through inmate messaging system, and or grievances submitted by, and or referencing or regarding, either Goodman or Wallace.
23. Clayton County Jail's annual USM-218 report;
24. Any assessments or audits of Clayton County Jail's compliance with contractual terms or governmental standards.

Respectfully submitted, this 11th day of July, 2023.

ERIC J. HERTZ, PC

/s/ Jeffrey E. Gewirtz

Jeffrey E. Gewirtz

GA State Bar No. 292434

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Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that I am counsel of record for Plaintiffs and that on the day indicated below I served a true and correct copy of Plaintiff's First Requests for Production of Documents with the Complaint.

This 11th day of July, 2023.

ERIC J. HERTZ, PC

/s/ Jeffrey E. Gewirtz

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